

# Exhibit E

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

**AMANDA BOSARGE, individually and on  
behalf of their minor children, et al.,**

*Plaintiffs,*

-against-

**DANIEL P. EDNEY, in his official capacity  
as the State Health Officer, et al.,**

*Defendants.*

Civil Action No. 1:22-cv-00233-  
HSO-BWR

**DECLARATION OF ATTORNEY ELIZABETH A. BREHM IN SUPPORT OF  
PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS**

I, Elizabeth A. Brehm, declare as follows:

1. I am an adult over 18 years of age and am an attorney duly licensed to practice law before all courts of the State of New York. I am a partner with the law firm of Siri & Glimstad LLP (“**the Firm**”) and counsel for Plaintiffs in the above-referenced action. I make this declaration in support of Plaintiffs’ Motion for Costs in the above-referenced action. The following facts are within my personal and professional knowledge and, if called as a witness herein, I can and will competently testify thereto.

2. I submit this declaration in support of Plaintiffs’ Motion for Attorneys’ Fees and Costs pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1988, and Rule 54(c) of the Local Uniform Civil Rules of the Southern District of Mississippi.

3. I graduated from Boston University in 2001, receiving a bachelor’s degree in Childhood Elementary; from Long Island University in 2004, receiving a Master’s degree in

Computers in Education; and from Hofstra University School of Law, graduating *magna cum laude*, in 2008. I was admitted to the New York State Bar in 2009 and have practiced before numerous courts in New York and multiple other states, both at the trial and appellate level. I have 13 years of litigation experience and have worked exclusively on vaccine-related policy and litigation work for more than three years. Prior to that, I focused on antitrust and securities class action litigation. I joined the Firm as an associate in 2020 and became a partner at the start of 2022. An appropriate rate for my services is at least \$425 per hour.

4. Based on a review of my records, this section will break down my time into two broad time periods: (1) entries related to the April 17, 2023 Preliminary Injunction Hearing; and (2) entries not related to the April 17, 2023 Preliminary Injunction Hearing.

<b>PI-Hearing-Related Hours</b>	<b>Non-PI Hearing-Related Hours</b>	<b>Rate</b>	<b>Total</b>
1.9	54.8	\$425	\$24,097.50

5. After reviewing research concerning appropriate attorney rates and other fee awards granted in this jurisdiction, and in a showing of good faith and taking into account that other attorneys or firms may arguably have devoted fewer resources to the case based on a less aggressive litigation strategy, I took great care to carefully review every itemized time entry entered by Siri & Glimstad LLP to eliminate a significant number of duplicative, unnecessary, or otherwise potentially objectionable charges. There were seventeen professionals at Siri & Glimstad LLP who entered time to this matter and only four of those billers' time entries remain. Each of those biller's rates were reduced. In addition, the deletion or zeroing out of a significant number of time entries resulted in only 601.6 hours being reflected in the fees Plaintiffs seek for Siri & Glimstad LLP's work, compared to the 892.7 originally billed to this matter.

Dated: September 21, 2023

Respectfully submitted,

SIRI & GLIMSTAD LLP

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*Attorney for Plaintiffs*